

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

CHAUNA JONES f/k/a CHAUNA CRAWLEY,  
TYRONE HENDERSON, on behalf of themselves  
and all other similarly situated individuals,

Plaintiffs,

v.

Case No.: 3:14-cv-678

EQUIFAX, INC., in its own name and t/a  
EQUIFAX WORKFORCE SOLUTIONS  
a/k/a TALX CORPORATION and  
EQUIFAX INFORMATION SERVICES LLC,

Defendants.

**AGREED MOTION FOR EXTENSION OF TIME FOR EQUIFAX DEFENDANTS TO  
ANSWER OR RESPOND TO PLAINTIFF'S CLASS ACTION COMPLAINT**

Defendants, Equifax Inc., in its own name and t/a Equifax Work Force Solutions a/k/a Talx Corporation, and Equifax Information Services LLC ("Defendants")<sup>1</sup>, by undersigned counsel, file this Motion for Extension of Time to Answer or Respond to Complaint as follows:

1. Plaintiff's Class Action Complaint ("Complaint") was filed on October 3, 2014.
2. Defendants were served with the Complaint on September 17, 2014. Defendants' response is due on November 7, 2014.
3. Defendants are still reviewing the allegations and conducting an investigation into them in order to prepare their response. Accordingly, Defendants respectfully request an extension through and including December 8, 2014 within which to file their answer or other responsive pleading in this matter.
4. Plaintiffs have no objection to this request for an extension.

---

<sup>1</sup> Defendants do not, by filing this motion, concede that they have been properly named in the Complaint.

5. Defendants have not sought any prior extensions.
6. A proposed Consent Order is filed contemporaneously herewith.

WHEREFORE, Defendants respectfully request that this motion be granted.

Respectfully submitted this 5th day of November, 2014.

/s/  
\_\_\_\_\_  
John W. Montgomery, Jr.  
Virginia State Bar No. 37149  
Counsel for Equifax Information Services, LLC  
John W. Montgomery, Jr., Attorney, PLC  
2116 Dabney Road, Suite A-1  
Richmond, VA 23230  
Telephone (804) 355-8744  
Facsimile (804) 355-8748  
Email: jmontgomery@jwm-law.com

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of November, 2014, I electronically filed the foregoing AGREED MOTION FOR EXTENSION OF TIME FOR EQUIFAX DEFENDANTS TO ANSWER OR RESPOND TO PLAINTIFFS' CLASS ACTION COMPLAINT with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Leonard Anthony Bennett, Esq.  
Consumer Litigation Associates  
763 J Clyde Morris Boulevard  
Suite 1A  
Newport News, VA 23601

Matthew James Erausquin, Esq.  
Casey S. Nash, Esq.  
Consumer Litigation Associates PC (Alex)  
1800 Diagonal Rd  
Suite 600  
Alexandria, VA 22314

/s/ \_\_\_\_\_  
John W. Montgomery, Jr.  
Virginia State Bar No. 37149  
Counsel for Equifax Information Services, LLC  
John W. Montgomery, Jr., Attorney, PLC  
2116 Dabney Road, Suite A-1  
Richmond, VA 23230  
Telephone (804) 355-8744  
Facsimile (804) 355-8748  
Email: jmontgomery@jwm-law.com